

Remarks

By the foregoing amendment the subject matter of original claims 19 and 20 have been added to the specification and the specification has been amended to correct a typographical error. In addition, claim 1 has been amended to recite an organic metallic complex having a formula $\text{Ln}^*[\text{Ln}(\text{polyamine})]_3$ wherein the polyamine is selected from the group consisting of ethylene diamine tetramine, DCTA, DTPA and TTHA and Ln and Ln^* are the same or different and are selected from the group consisting of transition metals, lanthanides and actinides. Claim 10 has been amended to recite an organic metallic complex of the formula $\text{Gd}[\text{Ln}(\text{polyamine})]_3$ or $\text{M}[\text{Gd}(\text{polyamine})]$ where M is an alkali metal. Dependent claims have been amended in view thereof. The amendment to the claims is supported by the original claims and Example 1 of the application.

The specification has been objected to on the basis it fails to provide proper antecedent basis for claim 19 and claim 20. The subject matter of claim 19 and claim 20 has been added to the specification.

Page 5, line 29 through page 6, line 3 of the specification has been objected to on the basis that "anode" was mistakenly written for "cathode". This typographical error has been corrected.

The Office Action states the application does not contain an Abstract of the Disclosure on a separate sheet as required. An Abstract of the Disclosure on a separate sheet is enclosed herewith.

Claims 21 and 22 have been rejected under 35 U.S.C. §112, second paragraph in that these claims refer to a different anode embodiment. Claim 21 has been canceled and claim 22 has been amended to refer to the metal electrode.

Claim 1-6 and 25 have been rejected under 35 U.S.C. §102(b) as being anticipated by an article entitled "Anomalous Scattering by Praseodymium, Samarium and Gadolinium Structures of their Ethylenediaminetetraacetate (edta) Salts" published in Acta Cryst, by Templeton.

Templeton merely discloses alkali metal salts of lanthanides such as gadolinium with an EDTA ligand. There is no teaching or suggestion in Templeton of a compound having the formula $\text{Ln}^*[\text{Ln}(\text{polyamine})]_3$ wherein Ln and Ln^* are the same or different and are selected from the group consisting of transition metals, lanthanides and actinides and wherein the polyamine is selected from the group consisting of ethylene diamine tetramine, DCTA, DTPA and TTHA as in independent claim 1. Accordingly Templeton fails to anticipate the claimed invention.

Claims 1, 2, 10, 11, 14, 15, 18, 19, 20, 22 and 26 have been rejected under 35 U.S.C. §102(b) as being anticipated by WO 98/55561 to Christou. In this regard the Examiner's attention is invited to the fact that Christou discloses an electroluminescent emitter which is a lanthanide salt with one or more pyrazolyl ligands. Pyrazolyl compounds are not polyamines. Accordingly, Christou fails to anticipate the claimed invention.

Claim 13 has been rejected under 35 U.S.C. §103 as unpatentable over WO 98/55561 to Christou. As discussed above, Christou fails to disclose or suggest the claimed invention.

Claim 20 has been rejected under 35 U.S.C. §103 as unpatentable over Christou in view of U.S. Patent No. 5,247,226 to Sato. Like Christou, Sato fails to teach or suggest the electroluminescent material of the claimed invention.


Claim 24 has been rejected under 35 U.S.C. §103 as being unpatentable over Christou in view of U.S. Patent No. 5,126,214 to Tokailin. Like Christou, Tokailin fails to disclose or suggest the electroluminescent material of the claimed invention.

Claims 27-31 have been rejected under 35 U.S.C. §103 as unpatentable to Christou in view of Templeton. More particularly, the Examiner contends it would be obvious to one skilled in the art to substitute the electroluminescent material taught by Templeton for the material used by Christou in order to take advantage of its luminescent properties. In fact there is no teaching or suggestion within the four corners of Templeton or Christou to modify Christou to include the EDTA complex disclosed by Templeton. There is simply no motivation within these two references for the combination thereof. Rather, it is respectfully submitted that it is only through hindsight reconstruction using the claimed invention as a blueprint that such a combination would be made by one skilled in the art.

In view of the foregoing all the pending claims are in proper form and in condition for allowance.

Prompt and favorable action is respectfully requested.

Respectfully submitted,


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